

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

INSPIRED PURSUITS, LLC,
QUALTIM, INC., CENTER FOR
BUILDING INNOVATION, LLC,
DRJ ENGINEERING, LLC, KIRK
GRUNDAHL, and SUZANNE
GRUNDAHL

Plaintiffs,

v.

PARAGON COMPONENT SYSTEMS,
LLC, JOHN HOLLAND, JAMES
HOLLAND, CLEARSPAN
COMPONENTS, LLC, ANDREW EWIN,
DAVID REED, SCOTT HOELSMA, SETH
DUNCAN, MICHAEL PITTS, AVERY
RADMACHER, NATHAN BIEREMA,
JEREMY BIEREMA, ROB EASON, and
THE ESTATE OF DANIEL HOLLAND EX
REL. SPECIAL EXECUTOR MARVIN B.
SPEED,

Defendants

Case No.: 3:25-CV-00075

DECLARATION FOR ROB EASON

I, Rob Eason, hereby declare and state as follows:

1. I am over 18 years of age and competent to testify to the matters set forth in this declaration. I make this declaration in support of the motion to dismiss the complaint for lack of personal jurisdiction.

2. I am a resident and domiciled in the State of Mississippi. I have lived and worked in Mississippi at all times relevant to the allegations in the Complaint.

3. I have not owned, rented, or leased property in Wisconsin. I do not maintain a mailing address, bank account, or telephone listing in Wisconsin. I do not pay taxes in Wisconsin.

4. I am the current President of Clearspan Components, Inc., a corporation organized under the laws of Mississippi. My work is based entirely in Mississippi, and I do not perform job functions in or directed at the State of Wisconsin.

5. To the best of my recollection, I have been to Wisconsin two (2) times.

6. In the fall of 2024, I was in Milwaukee, Wisconsin, for the Building Component Manufacturers Conference ("BCM Conference").

7. In the fall of 2018, I was in Milwaukee, Wisconsin, for the BCMC.

8. During both trips, I did not visit any site owned by the Grundahls that I was aware of.

9. Being forced to defend this lawsuit in Wisconsin would impose an undue burden on me. I have no reasonable expectation of being haled into court in Wisconsin.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on the 8TH day of April 2025.



Rob Eason